



May 5, 1995

Mr. William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

Re: ET Docket No. 95-18

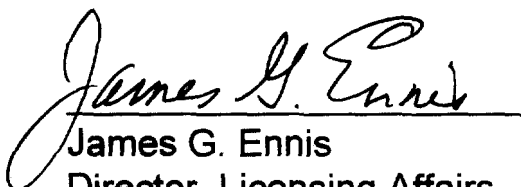
DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

Transmitted herewith, on behalf of Iridium, Inc., are an original and nine copies of Iridium, Inc's comments in connection with the Commission's ET Docket No. 95-18.

If further information is desired concerning this matter, please contact the undersigned.

Very truly yours,

  
James G. Ennis

Director, Licensing Affairs

**IRIDIUM, INC.**

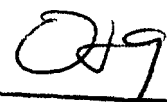
1401 H Street, N.W.

8th Floor

Washington, DC 20005

(202) 326-5677

No. of Copies rec'd  
List A B C D E



Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 2.106 of the	)	
Commission's Rules to Allocate	)	ET Docket No. 95-18
Spectrum at 2 GHz for Use by the	)	RM-7927
Mobile-Satellite Service	)	

**COMMENTS OF IRIDIUM, INC.**

Candace Johnson  
Vice President  
Government Affairs and Telecommunications Policy

James G. Ennis  
Director, Licensing Affairs

F. Thomas Tuttle  
Deputy General Counsel

Sallye A. Clark  
Licensing Specialist

**IRIDIUM, INC.**  
1401 H Street, N.W.  
Washington, D.C. 20005  
(202) 326-5600

May 5, 1995

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 2.106 of the	)	
Commission's Rules to Allocate	)	ET Docket No. 95-18
Spectrum at 2 GHz for Use by the	)	RM-7927
Mobile-Satellite Service	)	

**COMMENTS OF IRIDIUM, INC.**

Iridium, Inc. hereby submits its comments on the proposed allocation of the 1990-2025 MHz (Earth-to-space) and 2165-2200 MHz (space-to-Earth) bands to the Mobile Satellite Service ("MSS") as set forth in the Notice of Proposed Rulemaking ("NPRM") in the above-captioned proceeding.

In general, Iridium, Inc. supports the comments being submitted today in this proceeding by Motorola Satellite Communications, Inc. ("Motorola"). However, with respect to the issue of relocation costs, Iridium, Inc. has an additional proposal regarding broadcast auxiliary service ("BAS") which it believes should be accepted by the Commission.

In its comments, Motorola submits that the MSS providers should only pay for their fair share of the costs of moving fixed microwave and BAS channels. Motorola contends that to the extent that other service providers may benefit from such relocations, the other service providers should also pay for moving incumbent users. Motorola also notes that close attention must be paid to developing appropriate mechanisms for allocating these relocation costs among individual MSS providers licensed by the Commission.

Although Iridium, Inc. supports Motorola's comments on relocation costs for incumbent users, Iridium, Inc. suggests that the Commission should go farther and also adopt a "sunset" policy with respect to compensation for relocation of BAS systems. With respect to BAS systems, these relocation costs should be applicable only during a transition period and after a suitable period of time, BAS systems that remained in the 1990-2025 MHz band would no longer be compensated for moving.

The precedent for Iridium's proposal is the policy the Commission established in connection with the Direct Broadcast Satellite ("DBS") Service.<sup>1</sup> In the DBS proceeding, the Commission decided that terrestrial fixed service ("FS") operations would be subject to reassignment within or to other bands after a transition period. The Commission adopted a transition time period sufficiently far enough in the future to allow normal replacement of equipment to occur. During the transition period, existing terrestrial services and DBS would be considered co-equal and DBS licensees would have to compensate incumbent FS operators for the cost of their relocating to a different band. The Commission did not require the DBS operators to pay the costs of relocating the FS operations after the transition period. The Commission decided on the DBS relocation plan because it "would provide a more equitable and efficient solution, and it would allow introduction of DBS service while minimizing the cost to the

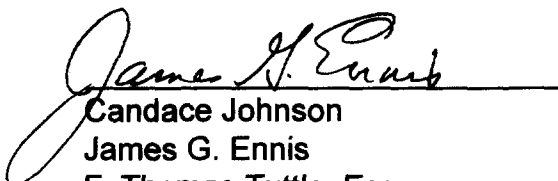
---

<sup>1</sup> In the Matter of Inquiry into the Development of Regulatory Policy in Regard to Direct Broadcast Satellites for the Period Following the 1983 Regional Administrative Conference, Gen. Docket No. 80-603, Report and Order, FCC 82-285, 90 F.C.C.2d 676 (adopted June 23, 1982).

existing terrestrial users."<sup>2</sup>

The sunset provision the Commission adopted for DBS was fair and equitable. In the instant proceeding, such a plan would also serve the public interest and be fair to both the MSS and the BAS services. It would facilitate the entry of MSS, and BAS operators would get full value for their investment in their equipment because they would be permitted to operate until their equipment was at or near the end of its useful life.

Respectfully submitted,  
IRIDIUM, INC.



Candace Johnson  
James G. Ennis  
F. Thomas Tuttle, Esq.  
Sallye A. Clark

IRIDIUM, INC.  
1401 H Street, N.W.  
Washington, D.C. 20005  
(202) 326-5600